

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No.: 1:19-cv-12551 FDS

**DECLARATION OF ANDREW BRUNS IN SUPPORT OF GOOGLE'S RENEWED
MOTION TO STAY PENDING *INTER PARTES* REVIEW**

I, Andrew Bruns, declare and state as follows:

1. I am an attorney licensed to practice law in the State of California and admitted to practice before this Court. I am an attorney at the law firm of Kecker, Van Nest and Peters, LLP and counsel for Defendant Google LLC, ("Google") in the above-captioned action.
2. I make this Declaration in support of Google's Renewed Motion to Stay Pending *Inter Partes* Review. I have personal knowledge of the facts stated herein and, if called as a witness, I could testify to them competently under oath.
3. As of today, Singular has propounded 21 of its possible 30 interrogatories and two of its possible three sets of requests for production. It has yet to serve any requests for admission, while the parties agreed to a limit of 25 such requests. For its part, Google has propounded 18 interrogatories, one set of requests for production. It, too, has yet to serve any requests for admission.
4. Attached as **Exhibit A** is a true and correct copy of an email from me to Kevin Gannon,

dated May 14, 2021.

5. Attached as **Exhibit B** is a true and correct copy of the transcript of proceedings before Magistrate Judge Cabell on April 30, 2021 regarding Google's Motion for Protective Order, ECF 153.

6. Attached as **Exhibit C** is a true and correct copy of the PTAB's Decision Granting Institution of IPR as to Google's Petition No. IPR2021-00155 as to U.S. Patent No. 10,416,961, dated May 12, 2021.

7. Attached as **Exhibit D** is a true and correct copy of the PTAB's Decision Granting Institution of IPR as to Google's Petition No. IPR2021-00165 as to U.S. Patent No. 9,218,156, dated May 13, 2021.

8. Attached as **Exhibit E** is a true and correct copy of the PTAB's Decision Granting Institution of IPR as to Google's Petition No. IPR2021-00179 as to U.S. Patent No. 8,407,273, dated May 14, 2021.

9. Attached as **Exhibit F** is a true and correct copy of Singular's third Rule 30(b)(6) Deposition Notice, dated May 5, 2021.

10. Attached as **Exhibit G** is a true and correct copy of an email from Anna Porto to Michael Ercolini, dated May 7, 2021.

11. Attached as **Exhibit H** is a true and correct copy of an email from Michael Ercolini to Anna Porto, dated May 4, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed May 14, 2020, at Mill Valley, California.

By: /s/ Andrew Bruns
Andrew Bruns

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed